

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al.,
individually and on behalf
of others similarly situated, No.
 Plaintiffs, 3:18-cv-01477-JR
 v.
NIKE INC., an Oregon
Corporation,
 Defendant.

VOLUME I

REMOTE VIDEOCONFERENCE 30(b)(6) DEPOSITION OF
ALISON DAUGHERTY
Taken in behalf of Plaintiffs
January 8, 2021

1 Matheson is executive vice president in human
2 resources; correct?

3 A. Correct.

4 Q. And do you also know who Emily, is it Favret?

5 A. I don't know how to pronounce it. I believe
6 that Emily is a member of the communications
7 team.

8 Q. Okay. The e-mail states, "We've heard from
9 strong and courageous employees." Do you see
10 that?

11 A. I do.

12 Q. Who are the strong and courageous employees to
13 whom Mr. Parker is referring?

14 MR. PRINCE: Objection; calls for
15 speculation and also outside the scope of this
16 witness's designated 30(b)(6) topics.

17 Q. BY MR. GOLDSTEIN: You may answer.

18 MR. PRINCE: If you know.

19 THE WITNESS: I don't know specific names or
20 specific employees. I believe that Mr. Parker
21 was recognizing that we had heard from more than
22 one employee.

23 Q. BY MR. GOLDSTEIN: Do you know that he was
24 referring to the employees who had submitted
25 complaints with the Starfish survey?

1 MR. PRINCE: Objection to foundation.
2 Objection based on scope and it also calls for
3 speculation.

4 Q. BY MR. GOLDSTEIN: You may answer.

5 MR. PRINCE: If you know based on your
6 personal knowledge.

7 THE WITNESS: In my personal --

8 Q. BY MR. GOLDSTEIN: Excuse me. We certainly
9 would want a corporate witness designee that
10 will cover this material, but I will hear
11 Ms. Daugherty's personal knowledge.

12 A. I believe that Mr. Parker was referring to
13 employees who responded to the anonymous survey.

14 Q. BY MR. GOLDSTEIN: You keep saying "anonymous
15 survey." Don't you know the names of some of
16 the people who filed complaints?

17 A. Yes. There were some individuals who identified
18 themselves in their survey responses. I call it
19 the anonymous survey, because the survey
20 producers, the survey, I do not know where the
21 survey came from or who created it or how it was
22 distributed.

23 Q. Do you know that there were senior-level female
24 employees who filled out the survey?

25 MR. PRINCE: Objection; lacks foundation,

1 Shaw or someone else?

2 A. Seyfarth Shaw.

3 Q. Now, Mr. Parker says, "We've become aware of
4 reports of behavior occurring within our
5 organization that do not reflect our core
6 values."

7 What reports of behaviors was he referring
8 to?

9 MR. PRINCE: Again, objection here based on
10 scope as well as calls for speculation.

11 THE WITNESS: My, my interpretation of that
12 would be information contained in the survey
13 responses.

14 Q. BY MR. GOLDSTEIN: In the Starfish survey
15 response?

16 A. In the survey responses.

17 Q. Alison, I'd like to refer you to what had
18 previously been marked as Exhibit 573, the
19 complaint in Stein v. Knight. And specifically
20 I want to refer you to pages 36 and 37 of the
21 complaint. Let me know when you've been able to
22 get to it, Alison.

23 A. Okay. I'm on page 36.

24 Q. Okay. There's a quotation that purports to be
25 from the board minutes of April 18th, 2018,

1 MR. PRINCE: Thank you. I appreciate that.

2 THE WITNESS: It just came up. I have it.

3 Q. BY MR. GOLDSTEIN: Did you attend Mr. Parker's
4 speech in May of 2018 for which this Exhibit 561
5 is a draft?

6 MR. PRINCE: Objection; scope and assumes
7 facts. Certainly if the witness has personal
8 knowledge, she's welcome to answer.

9 THE WITNESS: I believe I did.

10 Q. BY MR. GOLDSTEIN: Where do you give the speech,
11 Alison?

12 MR. PRINCE: Objection; calls for
13 speculation, outside the realm of the witness's
14 knowledge.

15 MR. GOLDSTEIN: I'm not asking her to
16 speculate. I just want to know where the speech
17 was given. She said she attended the speech.

18 THE WITNESS: So, well, and I should
19 clarify. I did not attend the speech in person.
20 I watched the speech from a Nike building on
21 video. I, my recollection is that Mr. Parker
22 would have given the speech from our, we have an
23 auditorium at the World Headquarters and that he
24 gave the speech from the auditorium. That would
25 have been typical practice.

1 Do you know what Mr. Parker is referring to
2 when he refers to a main set of complaints?

3 MR. PRINCE: And same objections here and
4 also would advise the witness to the extent that
5 any of this might implicate the attorney-client
6 privilege, she should not respond in that
7 regard.

8 THE WITNESS: Okay.

9 Q. BY MR. GOLDSTEIN: Again, let me say that if
10 you're not responding because of attorney-client
11 privilege, please let me know.

12 A. Yes. I will do so. I believe that the main set
13 of complaints refers to complaints contained in
14 the responses to the anonymous survey.

15 Q. BY MR. GOLDSTEIN: And do you know what he means
16 when he says that the complaints have been acted
17 on?

18 MR. PRINCE: Again, same objection with the
19 proviso regarding privilege.

20 THE WITNESS: Correct. I believe that
21 refers to the fact that the complaints were
22 reviewed, assessed and appropriate next steps
23 were taken.

24 Q. BY MR. GOLDSTEIN: And did those appropriate
25 next steps result in employees being forced to

1 exit?

2 A. Some, yes.

3 MR. PRINCE: Again, I'm going to reassert --

4 Q. BY MR. GOLDSTEIN: And who are the employees --

5 MR. PRINCE: -- privilege and --

6 Q. BY MR. GOLDSTEIN: -- were forced to exit as a
7 result of the larger investigation?

8 MR. PRINCE: Barry, Barry, speaking over
9 people doesn't ignore --

10 MR. GOLDSTEIN: I --

11 MR. PRINCE: So I want to --

12 MR. GOLDSTEIN: I'm sorry. I didn't hear
13 anybody.

14 MR. PRINCE: Okay. Sure.

15 MR. GOLDSTEIN: But go on.

16 MR. PRINCE: I wanted to make sure that we
17 state the objection here based on privilege.
18 And the witness, right, should not comment upon,
19 you know, the results and the information that
20 would have been handled with outside counsel and
21 inside counsel.

22 MR. GOLDSTEIN: I'm sorry. What was the
23 last statement that you made, Daniel? It was --
24 You're getting a little low.

25 MR. PRINCE: I'm sorry. I'm sitting

1 statement though because you originally said
2 yes, there were employees who exited and I asked
3 who they were.

4 MR. GOLDSTEIN: Are you, Daniel, are you
5 directing the witness not to answer the question
6 as to the names of the employees who Nike forced
7 to exit as a result of the investigation of the
8 Starfish survey?

9 MR. PRINCE: Well, I think that question has
10 a number of challenges. But the answer is, you
11 know, certainly I think all along we object to
12 the use of your phrasing of Starfish. We have
13 also objected to your, you know, statements that
14 I think that you believe there's a foundation
15 to. And on the basis of privilege I'm not going
16 to allow the witness to answer with regards to
17 the specific actions that were taken in
18 connection with inside and outside counsel.
19 So...

20 Q. BY MR. GOLDSTEIN: So I'm going to ask a
21 question clearly. And please let me know if
22 you're directing the witness not to answer.

23 What were the names, if any, of the
24 employees who were forced to exit the company as
25 a result of the larger investigation of the

1 complaints referenced by Mr. Parker?

2 THE WITNESS: Same objection. And at the
3 time being we're standing on our privilege
4 objection as well.

5 MR. GOLDSTEIN: So, in other words, you're
6 directing the witnesses not to answer this
7 question; is that correct?

8 MR. PRINCE: I am, yes.

9 Q. BY MR. GOLDSTEIN: Alison, we're uploading a
10 document with the title Nike Project Starfish,
11 Executive Summary, July 20th, 2018, Bates
12 numbers 00032843-85 (sic). It's 581.

13 A. I'm sorry. Can you repeat the page number?

14 Q. The page number is 00032843-45.

15 A. Yes. I have it.

16 Q. Is this a Nike document?

17 MR. PRINCE: Objection. This witness is not
18 the custodian of records. Outside the scope.

19 THE WITNESS: May I answer?

20 MR. PRINCE: You may answer if you know.

21 Q. BY MR. GOLDSTEIN: Yes?

22 A. Yes, it is.

23 Q. Okay. And the title is Nike Project Starfish,
24 Executive Summary. What is it?

25 A. Hold on. Oh. So are we on -- You and I may

1 MR. GOLDSTEIN: Understood. And again,
2 since she's not, according to your definition of
3 the topics a corporate witness, we will want a
4 corporate witness on all these topics.

5 MR. PRINCE: I'm not quite sure I understand
6 what that means. But if you want to talk about
7 it afterwards, happy to do so.

8 MR. GOLDSTEIN: I don't know how I could be
9 more direct.

10 Q. BY MR. GOLDSTEIN: But in any event, do you know
11 who KeJuan Wilkins is, Alison?

12 A. I do. I'm personally aware that KeJuan is a
13 member of the communications team.

14 Q. And what is the communications team?

15 MR. PRINCE: Objection.

16 THE WITNESS: There, we have a
17 communications function within Nike.

18 Q. BY MR. GOLDSTEIN: Is that a pipeline or a job
19 function by itself or does the communications
20 report to someone?

21 MR. PRINCE: Objection. She's not been
22 designated on the communications function. And
23 so she's not the witness on that topic.

24 Q. BY MR. GOLDSTEIN: You can answer.

25 A. Yes. There's a communication functions,

1 A. Yes. I see that paragraph.

2 Q. Do you know if there were complaints in the
3 Starfish survey that alleged that women were
4 being paid less than men for comparable work?

5 MR. PRINCE: Objection to the, again the
6 term, but the witness may answer if she
7 understands the question.

8 THE WITNESS: Yes. I recall there being
9 complaints raised in the survey responses that
10 included allegations of pay discrimination, you
11 know, alleging gender discrimination and pay
12 being a component.

13 Q. BY MR. GOLDSTEIN: We're uploading a document
14 that is Exhibit 587. And it's a Starfish survey
15 complaint submitted by [REDACTED] and the
16 number is Nike, excuse me, 00033338-43.

17 A. Okay. I have the document.

18 Q. I think you testified you did not know who [REDACTED]
19 [REDACTED] was or is. Excuse me.

20 A. I apologize. I don't recall you asking me about
21 [REDACTED].

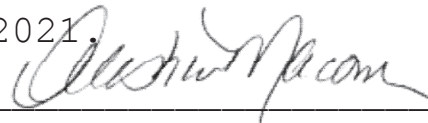
22 Q. Oh. I'm sorry. Maybe I didn't. Do you know
23 [REDACTED]

24 A. I don't know [REDACTED] personally. I'm
25 aware that she either has been or is an employee

C E R T I F I C A T E

I, Aleshia K. Macom, Oregon CSR No. 94-0296, Washington CCR No. 2095, California CSR No. 7955, RMR, CRR, RPR, do hereby certify that ALISON DAUGHERTY appeared before me remotely at the time and place mentioned in the caption herein; that the witness was by me first duly sworn on oath, and examined upon oral interrogatories propounded by counsel; that said examination, together with the testimony of said witness, was taken down by me in stenotype and thereafter reduced to typewriting; and that the foregoing transcript, pages 1 to 220, both inclusive, constitutes a full, true and accurate record of said examination of and testimony given by said witness, and of all other proceedings had during the taking of said deposition, and of the whole thereof, to the best of my ability.

Witness my hand at Portland, Oregon, this
18th day of January, 2021.



Aleshia K. Macom
Oregon CSR No. 94-0296
Expires 9-30-2023
Washington CCR No. 2095
Expires 7-7-2021
California CSR No. 7955

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VOLUME II

REMOTE VIDEOCONFERENCE 30(b)(6) AND PERSONAL
DEPOSITION OF ALISON DAUGHERTY
Taken in behalf of Plaintiffs
February 5, 2021

1 and ambiguous as to "anybody."

2 THE WITNESS: Yes. Ms. Neuburger who, you
3 know, was a part of the marketing organization
4 related that she was unhappy with the way that
5 leaders were, as I said earlier, you know, not
6 collaborating and not cooperating. So she, you
7 know, she had concerns about kind of her peers
8 and those around her in the marketing
9 organization.

10 Q. BY MR. BARRY GOLDSTEIN: Was Jayme Martin within
11 the marketing operation?

12 MR. PRINCE: Same objection as to scope.

13 THE WITNESS: No. I think at the time he
14 was the head of our category functions.

15 Q. BY MR. BARRY GOLDSTEIN: That would be as a vice
16 president?

17 A. Yes. He was a vice president.

18 Q. Did Jayme Martin leave the company in the spring
19 of 2018?

20 MR. PRINCE: Same objection as to scope.

21 THE WITNESS: He did.

22 Q. BY MR. BARRY GOLDSTEIN: And David Tawiah as
23 well?

24 A. Danny Tawiah.

25 Q. Excuse me. Danny Tawiah.

1 investigating concerns that had been raised
2 regardless of the genesis of those concerns.

3 Q. BY MR. BARRY GOLDSTEIN: So with respect to the
4 investigations done by outside counsel of the
5 Starfish survey complaints, can you tell me of
6 an investigation document that you reviewed or
7 saw in 2018?

8 MR. PRINCE: Vague and ambiguous. And I
9 think as the witness has testified before, that
10 to the extent the investigation was conducted or
11 carried out by counsel, that would be
12 privileged.

13 MR. BARRY GOLDSTEIN: Are you directing her
14 not to answer, Daniel?

15 MR. PRINCE: If she's able to answer your
16 question without revealing privileged
17 information, she may do so.

18 THE WITNESS: I, I think the answer to my
19 question is similar to my last answer in that I,
20 I hesitate to speculate in terms of
21 investigations tied to specific allegations made
22 in the survey. And so even if I could recall
23 off the top of my head a particular document
24 about a particular person, tying it back to a
25 concern raised in the survey, I'm not sure I can

1 where he talked about behaviors that saddened
2 him and that were contrary to the values that he
3 thought should be espoused at Nike?

4 MR. PRINCE: Objection; compound, improper
5 characterization, calls for speculation and
6 foundation.

7 THE WITNESS: I once again don't want to
8 speculate about Mark Parker's choice of words,
9 but my understanding is that, going back to what
10 we saw in that exhibit referencing KeJuan's
11 conversation with the reporter, again, there
12 were many different types of complaints coming
13 forward. And the overriding behavior was the in
14 crowd/out crowd and people feeling like they
15 were, people who were in, you know, feeling like
16 they were in an out crowd, that their careers
17 were different than people who were in the in
18 crowd. And it was not gender based. It was not
19 predominantly, you know, discrimination, as you
20 said earlier. It was, there was behavior that
21 was poor leadership within the company that
22 wasn't allowing us to, you know, to be where we
23 wanted to be in the future. I think, you know,
24 again, I'm speculating, but I think that was
25 what was making Mark sad.

1 the departures of [REDACTED]

2 [REDACTED]

3 [REDACTED]?

4 MR. PRINCE: Objection here on scope and
5 also foundation.

6 THE WITNESS: So I don't recall what we
7 confirmed to the outside, but sometime in that
8 time frame those individuals did leave Nike.

9 Q. BY MR. BARRY GOLDSTEIN: Were these departures
10 connected to the complaints filed with the
11 Starfish survey?

12 MR. PRINCE: Objection to scope as well as
13 foundation, calls for speculation.

14 THE WITNESS: So there's a lot of names
15 there. I don't recall the genesis of complaints
16 that came forward in terms of whether a
17 complaint came forward in a survey or through a
18 different channel.

19 Q. BY MR. BARRY GOLDSTEIN: Fair enough. Were
20 these departures connected to the complaints
21 filed with this Starfish survey or that came
22 through another channel?

23 MR. PRINCE: Foundation, scope, compound.

24 THE WITNESS: No. That's -- I don't recall.
25 If there were specific allegations that came up

1 about these individuals, I don't recall the
2 channel by which those allegations were
3 received.

4 Q. BY MR. BARRY GOLDSTEIN: Were these departures
5 connected to the investigations related to the
6 complaints filed with the Starfish survey or
7 that were filed around the same time as the
8 Starfish survey?

9 MR. PRINCE: Scope, foundation, compound,
10 asked and answered.

11 THE WITNESS: It's hard to group them. It's
12 hard to answer a question about a group of
13 individuals.

14 Q. BY MR. BARRY GOLDSTEIN: I could go through each
15 one. I'm trying to save some time, if you
16 could --

17 A. Right. Well, so there were concerns raised
18 about some. Whether or not they were related to
19 the survey, I can't recall, but, yeah.

20 Q. And Mr. Parker's -- Hold on one second.
21 Mr. Parker's e-mail of March 15th -- And I can
22 upload it for you if you would like.

23 A. That would be helpful.

24 Q. Okay. It's Exhibit 560 at page 2237.

25 MR. PRINCE: Barry, if you could give me

1 just one moment to download it.

2 MR. BARRY GOLDSTEIN: Sure.

3 MR. PRINCE: Okay.

4 THE WITNESS: Hold on. It's still loading
5 for me.

6 Q. BY MR. BARRY GOLDSTEIN: Mr. Parker says that
7 he's made a decision to restructure the
8 leadership team. And my question is, is the
9 departures of the six individuals that you
10 stated occurred between February and April 20 of
11 2018, part of Mr. Parker's restructuring that he
12 announced in his March 15th e-mail?

13 MR. PRINCE: Objection to scope, also
14 compound and foundation.

15 THE WITNESS: So no, I don't believe they
16 would be. The only, the only leadership team
17 individual that exited was [REDACTED]. The
18 others were not a part of Mark Parker's
19 leadership team.

20 Q. BY MR. BARRY GOLDSTEIN: What was [REDACTED]'
21 position when, at the time that he departed in
22 2018?

23 A. He -- I don't recall his exact title, but he was
24 leading the diversity and inclusion function.

25 Q. Was he a vice president of diversity and

1 inclusion?

2 MR. PRINCE: Scope.

3 THE WITNESS: I believe he was.

4 Q. BY MR. BARRY GOLDSTEIN: You said there were
5 concerns raised about these individuals. Can
6 you describe the concerns that were raised about
7 [REDACTED]?

8 A. Well, so I need to clarify my earlier statement.
9 There were -- Well, I'll answer. There were no
10 specific behavioral allegations that I'm aware
11 of about [REDACTED]. The, the concerns that
12 were raised about, you know, as I described
13 earlier, the in crowd, out crowd and the brand
14 marketing function leadership not working well
15 together, those contributed to questions about
16 the best leadership for the function.

17 Q. You didn't examine, did you, whether there had
18 been workplace complaints of sexual harassment
19 discrimination linked to policies of pay,
20 promotion and job duties against [REDACTED]rds
21 that had been filed, had you?

22 A. Well --

23 MR. PRINCE: Objection; asked and answered.

24 THE WITNESS: I'm sorry. Time frame. Are
25 you talking --

1 Have you followed me with my reference to
2 those two pages?

3 A. Yes.

4 Q. My question is, in light of having received a
5 14.3 percent increase in his base salary and the
6 forfeiture of \$6 million in stock options, why
7 did Mr. Edwards decide to retire in March 2018?

8 MR. PRINCE: Objection; scope.

9 Q. BY MR. BARRY GOLDSTEIN: If you know.

10 MR. PRINCE: Objection to scope. The
11 witness here clearly has not been designated on
12 securities filings and also calls for
13 speculation.

14 MR. BARRY GOLDSTEIN: I just want to know if
15 she knows.

16 THE WITNESS: I can't speculate into
17 decisions made by Trevor Edwards.

18 Q. BY MR. BARRY GOLDSTEIN: I'll ask you about a
19 decision made by Mr. Parker. Why did Mr. Parker
20 announce Mr. Edwards' retirement in an e-mail in
21 which he told employees that he has "become
22 aware of reports of behavior occurring within
23 our organization that do not reflect our core
24 values and this disturbs and saddens me"?

25 MR. PRINCE: Same objections with respect to

1 scope. This witness has not been designated on
2 securities filings and also calls for
3 speculation. I'll object here on the basis of
4 foundation as well.

5 MR. BARRY GOLDSTEIN: Again I'm just asking
6 if she knows.

7 THE WITNESS: Again, I can't speculate as
8 to -- I'm not inside Mark Parker's head. I
9 think, from my perspective, it was, it was a
10 time to share with the organization that we were
11 aware that there were concerns about the
12 environment that, you know, concerns had been
13 raised and that in particular the leadership of
14 the brand marketing function was not operating
15 with, the way we wanted it to, that as I talked
16 about with, you know, my conversation with Nikki
17 Neuburger, it was clear that, you know, there
18 were concerns with leaders not collaborating, of
19 making it a difficult place to work, of, you
20 know, acting in siloed manners and that we, we
21 were looking for a different structure and a
22 different way forward with leadership.

23 Q. BY MR. BARRY GOLDSTEIN: Well, as a result of a
24 Starfish survey and complaints filed at that
25 time, were there not concerns raised about

1 THE WITNESS: By "promotion discrimination"
2 do you mean that women felt that they were not
3 being promoted when men were?

4 Q. BY MR. BARRY GOLDSTEIN: Correct.

5 A. I just want to make sure I'm clear. I don't
6 often use -- I don't use that term. So --

7 Q. What do you use? I'm interested.

8 A. I don't actually have a term. That's what I'm
9 trying to understand. So promotion
10 discrimination meaning in this case a woman
11 feeling like they were not promoted when a man
12 was?

13 Q. Or they were denied a promotion or training
14 opportunity because of gender.

15 A. Okay. I believe that some of the those are what
16 we looked at today, that, again, there were
17 women who felt that they should have been
18 promoted when they weren't or that others were
19 promoted instead of them.

20 Q. I believe in some of the, a couple of the
21 complaints filed by vice presidents, they made
22 general statements with respect to promotion
23 discrimination.

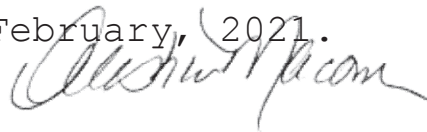
24 A. Okay.

25 Q. In 2018 did Nike take steps to improve the

C E R T I F I C A T E

I, Aleshia K. Macom, Oregon CSR No. 94-0296, Washington CCR No. 2095, California CSR No. 7955, RMR, CRR, RPR, do hereby certify that ALISON DAUGHERTY remotely appeared before me at the time and place mentioned in the caption herein; that the witness was by me first duly sworn on oath, and examined upon oral interrogatories propounded by counsel; that said examination, together with the testimony of said witness, was taken down by me in stenotype and thereafter reduced to typewriting; and that the foregoing transcript, pages 222 to 429, both inclusive, constitutes a full, true and accurate record of said examination of and testimony given by said witness, and of all other proceedings had during the taking of said deposition, and of the whole thereof, to the best of my ability.

Witness my hand at Portland, Oregon, this 16th day of February, 2021.



Aleshia K. Macom

OR CSR No. 94-0296, Expires 9-30-2023

WA CCR No. 2095, Expires 7-7-2021

Cahill, et al v. Nike**Alison Daugherty Deposition Errata**

Page: Line	Reads	Should Read	Reason
47:14	"Correct."	"Correct. I am not aware of any complaint of harassment against ████████"	To conform to the facts, consistent with other testimony
129:14	"Yes."	"Yes, on the 2019 playbook."	To correct a transcription error and conform to the facts, consistent with other testimony
172:12-14	"I believe that the main set of complaints refers to complaints contained in the responses to the anonymous survey."	"I believe that the main set of complaints refers to complaints contained in or made upon investigating the responses to the anonymous survey."	To conform to the facts, consistent with other testimony
172:20-23	"I believe that refers to the fact that the complaints were reviewed, assessed and appropriate next steps were taken."	"I believe that refers to the fact that complaints were reviewed, assessed and appropriate next steps were taken."	To conform to the facts, consistent with other testimony
176:2	"THE WITNESS"	"MR. PRINCE"	To correct a transcription error
184:1-2	"recorded function"	"communications reporting function"	To correct a transcription error
209:20	"ETW"	"The designation ETW"	To correct a transcription error and conform to the facts, consistent with other testimony
214:3	"for"	"from"	To correct a transcription error
218:3	"THE WITNESS"	"MR. PRINCE"	To correct a transcription error
257:22-24	"Again, I don't know that I can say I prepared in any specific way regarding these two topics."	"Again, I don't know that I can say I prepared in any specific way regarding these two topics, besides meeting with counsel."	To conform to the facts, consistent with other testimony
280:7-12	"No. We met, we met, the two of us. I believe the, actually I believe the first time I met ████████ Monique Matheson introduced her to me. And	"Yes. Monique Matheson was also there. I believe the, actually I believe the first time I met ████████ Monique Matheson introduced her to me. And we then proceeded,	To conform to facts

	we then proceeded, she and I then proceeded to have a conversation where I intook her complaints."	██████████ Ms. Matheson and I then proceeded to have a conversation where I intook her complaints."	
286:6-8	"but I am aware that that was a concern."	"but I am aware that ██████████ ██████████ being considered for promotion was a concern."	To correct a transcription error and conform to the facts, consistent with other testimony
304:6	"I believe we had a few followup meetings after"	"I believe we had a few follow up emails after"	To correct a transcription error
311:16-20	"I think that, you know, actually Monique didn't leave the meeting, but I can't recall if ██████████ and I simply moved and met alone that same day or if it was at a different time. I can't recall timing."	"I think that, you know actually Monique didn't leave the meeting."	To conform to facts
374:14	"ware"	"aware"	To correct a transcription error
393:11	"for"	"were"	To correct a transcription error
403:25	"amplified"	"Amplify"	To correct a transcription error
406:9	"dates and gates"	"dates and dates"	To correct a transcription error
425:24	"No."	"No; not in advance of my deposition."	To conform to the facts, consistent with other testimony
428:19	"I have not been"	"I have been"	To correct a transcription error

I attest that the above-referenced changes are true and correct.

Date: March 19, 2021


Alison Daugherty